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Attorney for Defendant
JESUS VASQUEZ

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,) 2:23-cr-00095-JAM
Plaintiff,)
v.) STIPULATION AND ORDER
JESUS VASQUEZ,) TO CONTINUE STATUS
JOEL GIL-SANDOVAL,) CONFERENCE
Defendant.)

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Kerry Blackburn, Joel Gil-Sandoval, by and through his counsel, Clemente Jimenez, and defendant, Jesus Vasquez, by and through his counsel, Jennifer Mouzis, hereby stipulate as follows:

- 1) By previous order, this matter was set for status on January 9, 2024.
 - 2) By this stipulation, defendant now moves to continue the status conference until **April 23, 2024, at 09:00 a.m.**, and to exclude time between January 9, 2024 and April 23, 2024, under Local Code T4.
 - 3) The parties agree and stipulate, and request that the Court find the following:

- 1 a) The discovery associated with this case includes over one hundred pages of reports,
2 photos, and search warrant documents, as well as cellular phone downloads. All of this
3 discovery has been either produced directly to counsel and/or made available for
4 inspection and copying.
- 5 b) Counsel for defendants desire further time to review the discovery with their clients,
6 research and investigate possible defenses, discuss any potential resolution with her
7 client, research mitigating evidence, and present it to the prosecution. Mr. Jimenez was
8 recently appointed to this matter on November 3, 2023.
- 9 c) Counsel for defendants believes that failure to grant the above-requested continuance
10 would deny them the reasonable time necessary for effective preparation, taking into
11 account the exercise of due diligence.
- 12 d) The government does not object to the continuance.
- 13 e) Based on the above-stated findings, the ends of justice served by continuing the case as
14 requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.
- 16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,
17 within which trial must commence, the time period of January 9, 2024 to April 23, 2024,
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
19 T4] because it results from a continuance granted by the Court at defendant's request on
20 the basis of the Court's finding that the ends of justice served by taking such action
21 outweigh the best interest of the public and the defendant in a speedy trial.
- 22 4) Nothing in this stipulation and order shall preclude a finding that other provisions of the
23 Speedy Trial Act dictate that additional time periods are excludable from the period within
24 which a trial must commence.

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2 IT IS SO STIPULATED.
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5 Dated: January 4, 2024

PHILLIP A. TALBERT
United States Attorney

6 By: /s/ Kerry Blackburn
7 KERRY BLACKBURN
8 Assistant United States Attorney

9 Dated: January 4, 2024

/s/ Clemente Jimenez
CLEMENTE JIMENEZ
10 Attorney for Defendant
11 JOEL GIL-SANDOVAL

12 Dated: January 4, 2024

/s/ Jennifer Mouzis
JENNIFER MOUZIS
13 Attorney for Defendant
14 JESUS VASQUEZ

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16 **ORDER**

17 IT IS SO ORDERED.

18 Dated: January 04, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
19 SENIOR UNITED STATES DISTRICT JUDGE
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